

# **EXHIBIT 3**

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

CHARLES GOLBERT, Cook County Public Guardian, on behalf of Trinity B., Romeo S., Connor H., Jadiene T., Corey C., Jymesha S., Tatyana H. and Jamya B.,

Plaintiff,

V.

AURORA CHICAGO LAKESHORE  
HOSPITAL, LLC, doing business as Chicago  
Lakeshore Hospital, *et al.*,

Defendants.

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)  
)  
) Case No. 19-cv-08257  
)  
)  
) Judge Mary M. Rowland  
)  
) Magistrate Judge Maria Valdez  
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**DECLARATION OF SCOTT R. DRURY**

Scott R. Drury declares as follows:

1. My name is Scott R. Drury. I am an attorney at the law firm of Loevy & Lovey in Chicago, Illinois. I am one of the attorney's representing Plaintiffs in the above-captioned matter.

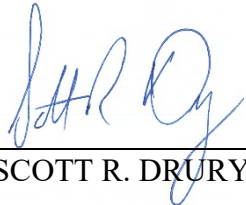
2. In connection with this case, Plaintiffs prepared a subpoena to be served on Sabra Health Care REIT, Inc. (“Sabra”). Before serving the subpoena on Sabra, Plaintiffs served a notice of subpoena *duces tecum* and the Sabra subpoena on Defendants Signature Healthcare Services, LLC and Aurora Chicago Lakeshore Hospital, LLC (collectively, “Defendants”), among others. Both the subpoena and the notice of subpoena stated that the subpoena compliance date was May 13, 2021. At no point prior to May 13, 2021, did Defendants object to the subpoena or seek to quash it. Further, in response to the notice of subpoena, Defendants did not request that documents be returned to Defendants for a confidentiality review or that any responsive documents be marked confidential.

3. On May 6, 2021, counsel for Sabra objected to the subpoena. Sabra's counsel and I subsequently met and conferred on various occasions by telephone and email.

4. On June 30, 2021, counsel for Plaintiffs and counsel for Defendants met and conferred by telephone regarding Defendants' motion for protective order (Dkt. 316). During the conference, I noted that the Court already had denied Defendants' motion for bifurcation and that Defendants' motion merely sought to re-raise the bifurcation issue. Defendants' counsel disagreed with my view of the motion. The parties were not able to resolve the dispute.

I declare and state under penalty of perjury of the laws of the United States of America that the foregoing is true and correct.

Executed on July 13, 2021

  
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SCOTT R. DRURY